

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: SHARON WILLIAMS,	:	CHAPTER 13
<i>Debtor.</i>	:	BKY. NO. 19-17528 (ELF)
	:	HEARING: 1/11/22 AT 9:30 AM
		COURTROOM #1

**DEBTORS' RESPONSE TO BANK OF NEW YORK'S MOTION FOR RELIEF FROM
STAY**

The Debtor, Sharon Williams, hereinafter referred to as the "Debtor," by and through her counsel, Center City Law Offices, LLC, hereby respectfully files her response to Bank of New York's Motion for Relief from Stay. For the reasons more fully set forth below, the Debtor submits that there is no basis for the Motion.

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. Debtor has no knowledge as to the averments in this paragraph.
6. Denied. Debtor denies that any amounts set forth in the motion are accurate.
7. Denied. Debtor has no knowledge as to the averments in this paragraph.
8. Denied. Debtor specifically denies that any of the amounts set forth in this paragraph are due and owing. Debtor reserves her right to provide proof of such payments prior to or at the hearing on this motion.
9. Denied for the reasons set forth in #8, above.

10. Admitted.

11. Admitted.

12. Admitted.

13. This paragraph contains legal conclusions for which no response is required.

WHEREFORE, the Debtor, Sharon Williams respectfully prays this Honorable Court deny any and all relief requested presently by the Motion of the Trustee, and specifically movant's request to be exempted from further compliance with Fed. Rule Bankr. P. 3002.1.

Respectfully submitted,

CENTER CITY LAW OFFICES, LLC

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Dated: January 3, 2022